



MARTINEZ PLANT

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May 16, 2002

Mr. Barry Young
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Subject: Comments on Title V Draft Permit
 Rhodia Martinez Facility, Plant #B1661
 Application #25842

Dear Mr. Young:

Rhodia Inc. has received and carefully reviewed the Draft Title V Permit, dated 4/11/02, and would like to submit the attached comments for your consideration.

We would like to express our sincere appreciation for your working with us on this permitting process.

If you have any questions regarding the enclosed information, please call me at (925) 313-8221.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony Koo".

Anthony Koo
Environmental Coordinator

Attachments

1. In Section I. Standard Conditions, please delete Part E1, which requires that the permit holder must provide any information records and reports requested or specified by the APCO. This condition is too broad and does not accurately describe the requirements of BAAQMD Regulation 1-441. Information requested by the APCO must be relevant to air emissions. This requirement is adequately addressed in Part B7 through 9.
2. In Section II, Table II B, Abatement Devices, A-2 Packed Bed Caustic Scrubber, please delete BAAQMD Regulation 6-301, 6-310 and 6-311. The Alky Tanks (S-19 and S-20), the Lube Spent Acid Tank and Truck Receiving (S-54 and S-55) and the Scrubber (A-2) are not sources of particulate matter and the BAAQMD Regulation 6 requirements do not apply.
3. In Section II, Table II B, Abatement Devices, A-7 Venturi Scrubber, add BAAQMD Condition #2756, Part 8, which specifies that the pressure drop of A-7 shall be maintained below 9.5 inches of water, whenever S-48 and S-49 are in operation.
4. In Section II, Table II B, Abatement Devices, A-11 Ammonia Scrubber, change BAAQMD Condition #17734 Part 23 to Part 17. Part 17 specifies the pH range. Part 24 requires recordkeeping for the pH of A-11. Part 23 refers to CO and NOx source testing of S-2 and does not apply to A-11.
5. In Section II, Table II B, Abatement Devices, A-16 Brink Type Mist Eliminator: A-16 could be an abatement device for both S-51 and/or S-52. Please make the following corrections:
 - a. Add BAAQMD Condition #13337, Parts 8A, 8B and 8C, when S-52 is abated by A-16.
 - b. Please delete BAAQMD Condition #13337 Part 22 because it does not exist. BAAQMD Condition Parts 18 and 19 refer to visible emissions but this is not a numeric limit and does not need to be in this table.
6. In Section II, Table II B, Abatement Devices, A-17 Brink Type Mist Eliminator: A-17 could be an abatement device for both S-51 and/or S-52. Please make the following corrections:
 - a. Add BAAQMD Condition #13337, parts 7A, 7B and 7C, when S-51 is abated by A-17.
 - b. Please delete BAAQMD Condition #13337 Part 22 because it does not exist. BAAQMD Condition Parts 18 and 19 refer to visible emissions but this is not a numeric limit and does not need to be in this table.
7. In Section IV, Table IV-A, S-1 Sulfuric Acid Plant, please make the following changes:
 - a. Please delete BAAQMD Regulation 9-1-604, Ground Level Monitoring, because the facility is not required to conduct ground level monitoring.
 - b. Please delete 40 CFR Part 62, Subpart F, and Section 62.1102 because Rhodia is not an identified source in the State Plans for Designated Facilities and Pollutants. Rhodia is in Contra Costa County and there are no designated existing facilities that are in Contra Costa County in this section.

- 8.** Section IV, Table IV-B, Auxiliary Boiler, please make the following changes:
 - a.** Please delete BAAQMD Regulation 6-401 Appearance of Emissions because this requirement does not apply to gas-fired heat transfer operations regulated by 6-301.
 - b.** Please delete BAAQMD Regulation 9-7-403 Initial Compliance Demonstration. The facility has completed initial compliance demonstration, so this is no longer applicable.
 - c.** Please delete BAAQMD Regulation 9-7-502 Modified Maximum Heat Input. This is a one-time demonstration of heat rating and is not an on-going requirement.
 - d.** Please delete BAAQMD Regulation 9-7-503.1. The source is not subject to BAAQMD Regulation 9-7-304 Low Fuel Usage Requirements, so documentation verifying annual tune-ups is not required.
 - e.** Please delete BAAQMD Regulation 9-7-503.4. The initial source test was completed several years ago. The records were only required to be kept for 24 months. This time has passed so this requirement is no longer applicable.
 - f.** Permit Condition #17734, Part 22 is listed as an applicable requirement. This is a typographical error. Part 23 applies to S-2 and is the correct reference.
- 9.** In Section IV, Table IV-C, S-3 Natural Gas Preheater Furnace, please make the following correction:
 - a.** Please delete BAAQMD Regulation 6-401 Appearance of Emissions because this requirement does not apply to gas-fired operations regulated by 6-301.
 - b.** Please delete BAAQMD Regulation 9, Rule 7 and the exemption because it is the District's policy not to include exemption citations in these tables.
- 10.** In Section IV, Table IV-E, S19 Alky Tank, T-1, please make the following corrections:
 - a.** Please delete BAAQMD Regulation 8, Rule 5 and the exemption because it is the District's policy not to include exemption citations in these tables.
 - b.** Correct the citation for recordkeeping for pH monitoring from Part 23 to Part 24. This is a typographical error.
- 11.** In Section IV, Table IV-F, S20 Alky Tank, T-3, please delete BAAQMD Regulation 8, Rule 5 and the exemption because it is the District's policy not to include exemption citations in these tables.
- 12.** In Section IV, Table IV-H, S-38 Sulfur Dioxide Transload System, please make the following corrections:

- a. Please delete BAAQMD Regulation 9-1-502 Emission Monitoring Requirements. This source is not subject to the specified sections of BAAQMD Regulation 9 or emissions monitoring requirements under BAAQMD Regulation 1-520 or 1-522.
 - b. Please delete BAAQMD Regulation 9-1-601 Sampling and Analysis of Gas Streams, because source testing is not required for this source.
 - c. Please delete BAAQMD Regulation 9-1-603 Averaging Times because source testing is not required for this source.
 - d. Please delete BAAQMD Regulation 9-1-604 Ground Level Monitoring, because the facility is not required to conduct ground level monitoring.
 - e. Please delete BAAQMD Regulation 9-1-605 Emission Monitoring, because the source is not required to conduct emission monitoring.
- 13.** In Section IV, Table IV-I, S-48 Conveying and Sizing System, please make the following corrections:
- a. Please delete BAAQMD Regulation 7, Odorous Substances. This regulation is correctly listed in the generally applicable requirements. The limits in this regulation only become applicable if the APCO receives odor complaints from 10 or more complainants within a 90-day period. This regulation has not been triggered at the Rhodia Martinez facility.
 - b. Please delete BAAQMD Condition #2756, Part 2. This condition should be removed from the Permit. (See discussion in Item 19 below regarding Section VI.)
 - c. Please delete BAAQMD Condition #2756, Part 7. This condition should be removed from the Permit. (See discussion in Item 19 below regarding Section VI.)
 - d. Please delete BAAQMD Condition #2756, Part 18. This condition should be removed from the Permit. (See discussion in Item 19 below regarding Section VI.)
- 14.** In Section IV, Table IV-J, S-49 Fluidized Bed Dryer, please make the following corrections:
- a. Please delete BAAQMD Regulation 7, Odorous Substances. This regulation is correctly listed in the generally applicable requirements. The limits in this regulation only become applicable if the APCO receives odor complaints from 10 or more complainants within a 90-day period. This regulation has not been triggered at the Rhodia Martinez facility.
 - b. Please delete BAAQMD Condition #2756, Part 2. This condition should be removed from the Permit. (See discussion in Item 19 below regarding Section VI.)
 - c. Please delete BAAQMD Condition #2756, Part 7. This condition should be removed from the Permit. (See discussion in Item 19 below regarding Section VI.)

- d.** Please delete BAAQMD Condition #2756, Part 18. This condition should be removed from the Permit. (See discussion in Item 19 below regarding Section VI.)
- 15.** In Section IV, Table IV-K, S-51 Oleum Storage Tank, please make the following corrections:
 - a.** Please delete BAAQMD Regulation 9-1-502 Emission Monitoring Requirements. This source is not subject to the specified sections of BAAQMD Regulation 9 or emissions monitoring requirements under BAAQMD Regulation 1-520 or 1-522.
 - b.** Please delete BAAQMD Regulation 9-1-604 Ground Level Monitoring, because the facility is not required to conduct ground level monitoring.
 - c.** Please delete BAAQMD Regulation 9-1-605 Emission Monitoring, because the source is not required to conduct emission monitoring.
 - d.** Add BAAQMD Regulation 12-10-501 Records: Oleum transfer checklists shall be retained for at least 4 consecutive quarters.
 - e.** Please delete BAAQMD Condition #13337 Part 15 because this condition should be removed from the Permit. (See discussion in Item 20 below regarding Section VI.)
- 16.** In Section IV, Table IV-L, S-52 Oleum Truck Loading, please make the following corrections:
 - a.** Add BAAQMD Regulation 9-1-601 Sampling and Analysis of gas Streams because this source is required to source test periodically.
 - b.** Add BAAQMD Regulation 9-1-603 Averaging Times because this source is required to source test periodically.
 - c.** Add BAAQMD Regulation 12-10-501 Records: Oleum transfer checklists shall be retained for at least 4 consecutive quarters.
 - d.** Please delete BAAQMD Condition #13337 Part 15 because this condition should be removed from the Permit. (See discussion in Item 20 below regarding Section VI.)
- 17.** In Section IV, Table IV-M, S-54 Alky Sulfuric Acid and Lubricant Spent Acid Process Tank, T-360, please delete BAAQMD Condition #17906, Part 11 because this condition has been deleted in Section VI.
- 18.** In Section IV, Table IV-N, S-55 Lube Spent Acid Truck Receiving Facility, please delete BAAQMD Condition #17906, Part 11 because this condition has been please deleted in Section VI.
- 19.** In Section VI, BAAQMD Condition #2756, please make the following corrections:
 - a.** Please delete Part 2. This condition duplicates the odor requirements specified in BAAQMD Regulation 2-1-317 and BAAQMD Regulation 7. In fact Part 2 is less stringent than

the permit requirement in BAAQMD Regulation 2-1-317 and would be subsumed by the regulatory citations. There is no reason to have a permit condition that duplicates regulatory requirements. BAAQMD Regulation 2 and BAAQMD Regulation 7 are included in the generally applicable requirements and are not source specific.

- b.** Please delete Part 7. This condition specifies a TSP limit and a pressure drop and is a duplicate of Part 3a and Part 8.
- c.** In Part 9, the throughput is incorrect. The throughput of zinc-hydroxide cake and/or recycled zinc material at S-48 shall not exceed 6,000 tons in any consecutive 12-month period.
- d.** In Part 11, the throughput is incorrect. The throughput of zinc-hydroxide cake and/or recycled zinc material at S-49 shall not exceed 6,000 tons in any consecutive 12-month period.
- e.** In Part 13, the throughput is incorrect. Natural gas usage at S-49 shall not exceed 81,000,000 standard cubic feet during any consecutive 12-month period.
- f.** Please delete Part 18. This condition requires particulate control and is a duplicate of Part 8.
- g.** Revise Part 19 to state the following:

On an annual basis, visible emissions shall be checked for S-48 and S-49 at the exit of A-7. If any visible emissions are detected by an untrained observer, the operator shall take corrective action to eliminate any visible emissions, and check for visible emissions again with an untrained observer. If visible emissions cannot be eliminated, the operator shall perform a certified visible emissions evaluation in accordance with BAAQMD 6-601 to determine compliance with Part 1, above. All visible emissions observations (both certified and uncertified) shall take place while the equipment is operating and during daylight hours. If plant has not operated for during the calendar year, no inspection is required.

- h.** Revise Part 21 to state the following:

To determine compliance with part 3b above, the Permit Holder shall perform a source test to measure NOx emissions from S-49, only if annual fuel usage exceeds 90,000 therms per calendar year. Regardless of fuel usage, source testing shall not be required more than once every five years. The Permit Holder shall obtain approval for all test procedures from the District's Source Test Section at least 7 days before conducting.....

20. In Section VI, BAAQMD Condition #13337, please make the following corrections:

- a.** Please delete Part 15 because this condition is redundant to Parts 11 and 12, which also require monthly records of throughput.
- b.** Revise Part 16 to state the following:

In order to demonstrate compliance with the above emission limit conditions, the Permit Holder shall perform a source test to measure the SO₂, SO₃, and sulfuric acid from S-51 and S-52, only if annual throughput of oleum sulfuric acid material exceeds 36,000 tons per calendar year. Regardless of throughput, source testing shall not be required more than once every five years. The Permit Holder shall obtain approval for all test procedures from the District's Source Test Section at least 7 days before conducting.....

c. Revise Part 18 to state the following:

On an annual basis, visible emissions shall be checked for S-51 and S-52 at the exit of A-16 or A-17. If any visible emissions are detected by an untrained observer, the operator shall take corrective action to eliminate any visible emissions, and check for visible emissions again during the next loading event with an untrained observer. If visible emissions cannot be eliminated, the operator shall perform a certified visible emissions evaluation in accordance with BAAQMD 6-601 to determine compliance with Part 3, above. All visible emissions observations (both certified and uncertified) shall take place while the equipment is operating and during daylight hours. If plant has not operated during the calendar year, no inspection is required.

21. In Section VI, BAAQMD Condition #17734, please make the following corrections:

a. Under source and abatement device listing, please change S-20 Alky Tank T-2 to T-3.

b. Add the following to Part 22:

If three consecutive annual source tests show that actual emissions are less than 50 percent of each emissions standard, the frequency of source testing can be reduced to once per five-year permit term. The frequency of source testing shall revert back to annually if any source test indicates that actual emissions are 50 percent or more of any emission standard. The frequency of source testing can again be reduced to once per five-year permit term if another three consecutive annual source tests show that actual emissions are less than 50 percent of each emissions standard.

c. Modify Part 23 to require testing every 5 years, only if, in any one of the 5 calendar years natural gas fuel usage in S-2 exceeds 90,000 therms.

22. In Section VI, BAAQMD Condition #17906, modify Part 10 to allow alkylation and lube spent acid:

Only the contents of truck vessels shall be received (unloaded) at S-55. There shall be no material other than Lubricant Spent Acid (Regular, Low and/or High Molecular Weight) and/or Spent Alky Sulfuric Acid (Alky Spent Acid) received at S-55. There shall be no unloading of rail (road) cars at S-55.

23. In Section VII, Table VII-A, S-1 Sulfuric Acid Plant, change the last throughput condition from BAAQMD Condition #17734, Part 10 to Part 9. This is a typographical error. The limit should be 629,062 tons per year.

- 24.** In Section VII, Table VII-B, S-2 Auxiliary Boiler, change the NO_x and CO source test frequency to P/E Every 5 years, only if in any of those years natural gas fuel usage exceeds 90,000 therms. Otherwise, no source testing is required. Also, change the monitoring citation to BAAQMD Condition #17734, Part 23, rather than Part 22. This is a typographical error.
- 25.** In Section VII, Table VII-D, Sulfur Storage Tanks, correct the annual throughput limit citation from BAAQMD Condition #17734, Part 11 to Part 10. This is a typographical error. The throughput limit cited is correct.
- 26.** In Section VII, Table VII-F, S-20 Alky Tank, correct the citation for the annual throughput from Part 13 to Part 12. This is a typographical error. The throughput limit cited is correct.
- 27.** In Section VII, on page 57, please make the following corrections to the table for S-30 Gasoline Dispensing Facility:

 - a.** Change the title to read Table VII-G instead of VI-G.
 - b.** Please delete the line for a VOC limit since there is no numeric limit. Add BAAQMD Regulation 8-7-503, Recordkeeping Requirement, to the monitoring requirement citation for the throughput limit. Under monitoring frequency enter P/M for monthly records. Annual throughput recordkeeping requirement in BAAQMD Regulation 8-7-503 will be subsumed with monthly records required in Permit Condition 17817, Part 1.
- 28.** In Section VII, Table VII-H, S-38 Sulfur Dioxide Transload System, please make the following corrections:

 - a.** Add N (none) for monitoring frequency for the SO₂ limits (BAAQMD Regulation 9-1-301 and 9-1-302).
 - b.** Under throughput limits, change BAAQMD Condition #17734, Part 14 to Part 13. This is a typographical error. The throughput limit cited is correct.
- 29.** In Section VII, Table VII-I, S-48 PEP Conveying and Sizing Subsystem, please make the following corrections:

 - a.** For the opacity limit in BAAQMD Condition #2756, Part 1, correct the limit to read Ringelmann 0.5 for no more than 3 minutes in any hour. Under monitoring requirement citation, add BAAQMD Condition #2756, Parts 19 and 20. For frequency, use P/A, if operating during the calendar year. For monitoring type, add visible inspection and records.
 - b.** For the opacity limit in BAAQMD Regulation 6-301, correct the limit to read Ringelmann No. 1 for no more than 3 minutes in any hour. Under monitoring requirement citation, add BAAQMD Condition #2756, Parts 19 and 20. For frequency, use P/A, if operating during the calendar year. For monitoring type, add visible inspection and records.

- c. For the fine particulate limits, correct BAAQMD Condition #2756, Part 7 to Part 8, since Part 7 will be deleted. Part 8 specifies pressured drop monitoring.
 - d. Under the throughput limit, BAAQMD Condition #2756, Part 9, change the limit to the following:

6,000 tons of zinc-hydroxide cake and/or recycled zinc material in any consecutive 12-month period.
 - e. Under the throughput limit, BAAQMD Condition #2756, Part 10, change the limit to the following:

monthly average of 16.8 tons of zinc-hydroxide cake and/or recycled zinc material per calendar day.
- 30. In Section VII, Table VII-J, S-48 PEP Fluidized Bed Dryer Subsystem, please make the following corrections:
 - a. For the opacity limit in BAAQMD Condition #2756, Part 1, correct the limit to read Ringelmann 0.5 for no more than 3 minutes in any hour. Under monitoring requirement citation, add BAAQMD Condition #2756, Parts 19 and 20. For frequency, use P/A, if operating during the calendar year. For monitoring type, add visible inspection and records.
 - b. For the opacity limit in BAAQMD Regulation 6-301, correct the limit to read Ringelmann No. 1 for no more than 3 minutes in any hour. Under monitoring requirement citation, add BAAQMD Condition #2756, Parts 19 and 20. For frequency, use P/A, if operating during the calendar year. For monitoring type, add visible inspection and records.
 - c. For the fine particulate limits, under monitoring requirement citation, correct BAAQMD Condition #2756, Part 7 to Part 8, since Part 7 will be deleted. Part 8 specifies pressure drop monitoring.
 - d. Under the NO_x limit, change the monitoring frequency to P/Every 5 years if fuel usage exceeds 90,000 therms in calendar year. For monitoring type, remove the word annual.
 - e. Under dryer temperature limits, add BAAQMD Condition 2765, Part 6 to the monitoring requirement citation. Under monitoring type and records.
 - f. Under the throughput limit, BAAQMD Condition #2756, Part 11, change the limit to the following:

6,000 tons of zinc-hydroxide cake and/or recycled zinc material in any consecutive 12-month period.
 - g. Under the throughput limit, BAAQMD Condition #2756, Part 12, change the limit to the following:

monthly average of 16.8 tons of zinc-hydroxide cake and/or recycled zinc material per calendar day

- h.** Under the throughput limit, BAAQMD Condition #2756, Part 13, change the limit to the following:

81,500,000 standard cubic feet natural gas for consecutive 12-month period.

Change the monitoring citation to BAAQMD Condition #2756, Part 16 to Part 15.

- i.** Under the throughput limit, BAAQMD Condition #2756, Part 14, change the limit to the following:

monthly average of 223,530 standard cubic feet per calendar day

Change the monitoring citation to BAAQMD Condition #2756, Part 16 to Part 15.

- 31.** In Section VII, Table VII-K, S-51 Oleum Storage Tank, T-19, please make the following corrections:

- a.** Under the oleum limit cited in BAAQMD Regulation 12-10-401, add N under frequency of monitoring. No monitoring is required. Process Hazards Analysis measures prescribed in this rule were conducted to prevent exceedences of this limit.
- b.** Under the throughput limit in BAAQMD Condition #13337 Part 1, change the monitoring requirement citation from BAAQMD Condition number from 17734 to 13337. This is a typographical error. Change Part 15 to Part 11 because Part 15 should be deleted per discussion in Section VI, Item 20 above.
- c.** Under throughput limits, change the citation of limit from BAAQMD Condition #13337, Part 15 to BAAQMD Condition #13337, Part 13. This is the correct reference. Change the wording of the limit to the following:
 - 1.** monthly average of 300 tons of oleum sulfuric acid material per calendar day
 - 2.** Under the monitoring requirement citation, change the BAAQMD Condition number from 17734 to 13337. This is a typographical error. Change Part 15 to Part 11 because Part 15 should be deleted per discussion in Section VI, Item 20 above.
- d.** Change TSP limit to FP. Under monitoring requirement citation add BAAQMD Condition #13337, Parts 18 and 19. Under frequency, change N to P/A if operating during the year. For monitoring type, add visible inspection and records.
- e.** Under SO₂ limits for 9-1-302 and BAAQMD Condition #13337 Parts 7A, 7B, and 7C, change monitoring frequency to P/Every 5 years if throughput exceeds 36,000 tons per calendar year.

- 32.** In Section VII, Table VII-K, S-52 Oleum Truck Loading, please make the following corrections:
- a.** Under the oleum limit cited in BAAQMD Regulation 12-10-401, add N under frequency of monitoring. No monitoring is required. Process Hazards Analysis measures prescribed in this rule were conducted to prevent exceedences of this limit.
 - b.** Under the throughput limit in BAAQMD Condition #13337 Part 2, change the monitoring requirement citation from BAAQMD Condition #13337 Part 15 to Part 12 because Part 15 should be deleted per discussion in Section VI, Item 20 above.
 - c.** Under the throughput limit, change the citation of limit from BAAQMD Condition #13337, Part 16 to Part 14. This is the correct reference. Change the wording of the limit to the following:
 - 1.** monthly average of 300 tons of oleum sulfuric acid material per calendar day
 - 2.** Under the monitoring requirement citation, change the BAAQMD Condition #13337 Part 15 to Part 12 because Part 15 should be deleted per discussion in Section VI, Item 20 above.
 - d.** Change TSP limit to FP. Under monitoring requirement citation add BAAQMD Condition #13337, Parts 18 and 19. Under frequency, change N to P/A, if operating during year. For monitoring type, add visible inspection and records.
 - e.** Under SO₂ limits for 9-1-302 and BAAQMD Condition #13337 Parts 8A, 8B, and 8C, change monitoring frequency to P/Every 5 years if throughput exceeds 36,000 tons per calendar year.
- 33.** In Section VIII, Test Methods, correct the header on page 67 from VII to VIII. Also, please delete the following requirements and test methods because they are not applicable:
- a.** BAAQMD Regulation 9-1-301 Ground Level SO₂. No ground level monitoring is required.
 - b.** BAAQMD Condition #13337, Part 7 Ringelmann 0.5. Part 7 refers to sulfur compound emission limits and not opacity.
- 34.** In Section IX, Table IX-A, S-1 Sulfuric Acid Plant, please change 40 CFR 60, Subpart Cb to 40 CFR 60, Subpart H. The facility is subject to the emission guidelines in Subpart Cb, but not to the standard in Subpart H because of the date of construction and no modification.
- 35.** In Section IX, Table IX-B, S-2 Auxiliary Boiler, add BAAQMD Regulation 9-1-502 Emission Monitoring, BAAQMD 1-520 and BAAQMD 1-522. - A source subject to requirements of 9-1-304, shall comply with the monitoring requirements of 1-520 and 1-522. Note that 1-520 does not list this type of source, so no emission monitoring is required.
- 36.** In Section IX, Table IX-G, add S-57 Ammonium Sulfate/Bisulfite Tank, T-453C to title.